

LAW OFFICES OF
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Attorney for defendant David Reid

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

CR-05-1849 JH

VS.

DAVID REID,

Defendant.

SECOND MOTION FOR MODIFICATION OF CONDITIONS
OF RELEASE (UNOPPOSED)

The defendant David Reid, by his counsel undersigned, hereby
moves this Court for an Order modifying his conditions of release (travel
restrictions only). Counsel undersigned has reviewed this matter with

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1 James Braun, the Assistant United States Attorney handling this matter.
2 Mr. Braun has no objection to the entry of this Order.

3
4 Personnel in the office of counsel undersigned have reviewed this
5 matter with PTS personnel in both Phoenix, Arizona and Santa Fe, New
6 Mexico. Mr. Reid has reviewed the details of the proposed modification
7 and the reason therefore with Dominnico Encinias of PTS in Santa Fe PTS
8 has no objection to this modification.
9

10 Mr. Reid's mother resides in Newberg, Oregon. She is very ill and is
11 not expected to live much longer. Mr. Reid would be traveling to visit her
12 whenever possible to help care for her and to help her get her affairs in
13 order.
14

15 Therefore, the Court is respectfully urged to allow Mr. Reid to be
16 allowed to travel to visit his mother in Newberg, Oregon, subject to advising
17 PTS as to where he will be going, when he will be leaving, and when he will
18 be returning, prior to commencing the trip.
19

20 No hearing is requested on this matter. A copy of this motion and the
21 proposed order are being provided to Dominnico Encinias (PTS, New
22 Mexico) and Claudette Thomas (PTS, Arizona).
23

24 . . .
25 . . .
26

1 RESPECTFULLY SUBMITTED this 21st day of December, 2007.

2 LAW OFFICES OF
3 NASH & KIRCHNER, P.C.

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5
6 BY /s/ Walter Nash
7 WALTER NASH
8 Attorney for Defendant Reid
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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of December, 2007, I served a true and correct copy of this Joinder by U.S. Mail, postage prepaid, on counsel for the United States at the address listed below:

James R.W. Braun, Esq.
Assistant United States Attorney
P.O. Box 607
Albuquerque, New Mexico 87103

/s/ Walter Nash

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